Exhibit "C"

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December 18, 2006

VIA FACSIMILE & U.S. MAIL

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RE:

Gerald Ruhnow, et al., v. Lane Heard Trucking, LLC, et al. 2:05-CV-527-F, U.S. District Court for the Middle District of Alabama

Dear Counsel:

Pursuant to Rule 26 of the *Federal Rules of Civil Procedure* and the Court's Uniform Scheduling Order in the above-referenced case, the following represents disclosures required by Sections 9 through 11 of the Uniform Scheduling Order.

Witnesses

The following are the names, addresses and telephone numbers of all witnesses expected to be called by us, except those witnesses intended solely for impeachment purposes:

Marilyn Heard

Lane Heard Trucking Company 1010 Hickory Ridge Drive New Albany, Mississippi 38652 (662) 534-4816

Lane Heard

Lane Heard Trucking Company

> 1010 Hickory Ridge Drive New Albany, Mississippi 38652 662) 534-4816

Randall Jackson (via video taped deposition) 630 Washington Street Orlando, FL 32801 (407) 832-2452

Gene Richardson (via video taped deposition) 276-B Timber Ridge Drive Thomasville, GA 31757 (229) 226-3912

Gerald Ruhnow 9655 N. 1400 Avenue Osco, IL 61274 (309) 522-5875

Connie Ruhnow 9655 N. 1400 Avenue Osco, IL 61274 (309) 522-5875

Christy Champion 171 Cactus Drive, Box 101 Troy, AL 36081 (334) 566-7122

Michael Adkins 452 South Main Street Brundidge, AL 36010 (334) 735-3993

Chris Bloomberg
Bloomberg Consulting
Post Office Box 336
Gulf Breeze, Florida 32562
(850) 932-7613

The following witnesses may be called if the need arises:

Jimmy Helms
AL Dept. of Public Safety

> 5679 Montgomery Hwy. Dothan, AL 36303 (334) 242-0705

Kevin Cook

AL Dept. of Public Safety 5679 Montgomery Hwy. Dothan, AL 36303 (334) 983-4587

We may also call any witness identified by any other party on their respective witness lists. We reserve the right to call other witnesses needed for rebuttal, impeachment or to lay foundation for trial exhibits.

Deposition Testimony

The following are designations of deposition transcripts (page number: line numbers) that we may use at trial, except for those used solely for impeachment:

Gene Richardson (video taped deposition):

5: 11-19

6: 4-13

7: 18-20

8: 18-25

9: 1-25

10: 1-11

11: 15-25

12: 1-25

13: 1-25

14: 1, 7-19

15: 8-25

16: 1-11

17: 12-18

20: 6-10

24: 16-25

25: 1-7

Randall Jackson (video taped deposition):

5: 5-22

6: 8-24

7: 11-25

8: 1-25

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- 9: 1-25
- 10: 1-25
- 11: 1-21
- 20: 4-25
- 21: 1-10
- 22: 10-25
- 23: 1-10
- 24: 1-25
- 25: 1-15
- 27: 10-25
- 28: 1-25
- 29: 1-3
- 33: 6-25
- 34: 1, 17-25
- 35: 1-8
- 42: 9-13, 24-25
- 43: 1-12, 22-24
- 44: 12-14, 21
- 46: 22-25
- 47: 1-19
- 48: 13-25
- 49: 1-2
- 54: 7-20
- 59: 5-25
- 60: 1-14
- 64: 7-16, 24-25
- 65: 1-6
- 68: 13-19
- 69: 16-24
- 70: 5-7, 14-17

Christy Champion

- 25: 24-25
- 26: 1-6
- 30: 12-25
- 41: 13-19
- 58: 15-22

We reserve the right to designate portions of those depositions for which we have not received transcripts, including but not limited to Jimmy Helms, Kevin Cook, Chris Bloomberg, and Dr. James Cross.

Exhibits

The following is a list of exhibits we may use at trial, all of which are available for your inspection in our offices:

- Certified copy of Report of Autopsy and Toxicological Analysis Report of Michael Duke (LHT1 0159-166)
- Full Pull Magazine Fall 2004
- Copy of Road Test Checksheet (LHT1 0086-87)
- Certified copy of title records from the Alabama Department of Revenue pertaining to vehicle vin number 1G2NE5436PC765798
- Copy of Certificate of Title for a Vehicle, title number 35530546
- Copies of Alabama Uniform Traffic Accident Report numbers 5016360 and 5506412
- Copy of Traffic Homicide Investigation Report made by Trooper Kevin D. Cook for case number AST 38-05-059 with redacted driving history of Michael Duke
- Copy of letter from A.X. Ball at Northland Insurance to Safeway Insurance Alabama dated September 8, 2005
- Certified copy of Mississippi motor vehicle report for Michael Duke
- Certified copy of medical records of Michael Duke from Troy Regional Medical Center
- Copy of medical records of Michael Duke from Haynes Ambulance of Troy
- Copy of Report of Bloomberg Consulting dated November 3, 2006
- Copy of Alabama Code Vehicle Lighting Requirements
- Copy of Mississippi Code Vehicle Lighting Requirements
- Copy of Bloomberg Consulting Field Notes
- Copy of Bloomberg Consulting Scene Total Station Survey
- Powerpoint presentation of expert Bloomberg Consulting depicting collisions involved in this litigation
- Report of Will Marvin and related damage documentation produced by Linda Ambrose under cover letter dated July 18, 2006
- Drawing by Christy Champion (Exhibit to her deposition)
- Drawing by Michael Adkins (Defendant's Exhibit 2 to his deposition)
- Drawing by Randall Jackson (Exhibit 1 to his deposition)
- Photographs with redacted descriptions of various vehicles involved in collisions
- Photographs from Bloomberg Consulting
- Photographs of the scene taken by the police
- Photographs of the vehicles involved and the scene taken post-accident

We reserve the right to designate exhibits not yet produced, for example any documents produced at the depositions for which we have not yet taken, including but not limited to Jimmy Helms, Kevin Cook, and Dr. James Cross.

If you have any questions or concerns, please feel free to contact me'at the abovereferenced number.

Sincerely,

Katie Hammett For the Firm

KLH/tlt